## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20354

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FEB 23 1995

In the Matter of

Amendment of the Amateur Service Rules Concerning the 222-225 MHz and 1240-1300 MHz Frequency Bands FCC MAIL ROOM

R Docket 92-289

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## COMMENTS ON NOTICE OF PROPOSED RULE MAKING

FEB 2 3 1993!

My comments are directed to the American Radio Relation COMMISSION League (ARRL) proposal (RM-7869) to prohibit auxiliary OFFICE OF THE SECRETARY operation in the 222.00-222.15 MHz frequency range.

As a user of the Northern California/Nevada DX Packet Spotting Network (DXPSN), I would be disenfranchised from my present ability to communicate with other such users in California, should the proposed changes to 97.201(b) be enacted as proposed.

DXPSN has followed generally accepted coordination procedures in securing its 222.140 MHz link frequency between California and Nevada, and, due to congestion and the "weak signal" nature of the link, no substitute frequencies are available between 222.15 MHz and 225.00 MHz. The link in question is a 105 mile knife-edge path (spanning the Sierra Nevada Mountains) with multiple obstructions which cannot be moved to available frequency bands above 225 MHz as the intrinsic additional losses would make the path unusable.

Therefore, I request that if 97.201(b) is changed, that auxiliary operations on 222.14 MHz be allowed to continue by reducing the upper limit of the frequency range excluded from auxiliary stations to 222.13 MHz or lower, rather than 222.15 MHz as proposed.

Respectfully submitted,

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Original and 4 copies to: Office of the Secretary, Federal Communications Commission, Washington D.C. 20554.